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By:

March 28, 2014

Honorable Naomi Riece Buchwald, U.S.D.J.
Southern District Court of New York
500 Pearl Street
New York, New York 10007

RE: Calumba et al. v. Massey et al.
Docket No. 13-cv-8936 (NRB)

Dear Judge Buchwald,

I am the counsel for the defendants, and I filed the answer with counterclaims. On March 19, 2014, Felix Vinluan, the attorney for the plaintiffs, wrote a letter to the court alleging therein that there is no legal merit in the counterclaim and he proposes to move for dismissal of the counterclaims. My client, defendant Raina Massey, is out of town and she is expected to come to my office on April 2, 2014. I need some information from her to prepare the response to the plaintiff's letter.

I request this Honorable Court to extend time until April 7, 2014.

Respectfully Submitted,

_____/s/_____
Satish K. Bhatia, Esq. (SB 9222)